

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

<b>IN RE: TERRORIST ATTACKS ON</b>	<b>:</b>	<b>Civil Action No.</b>
<b>SEPTEMBER 11, 2001</b>	<b>:</b>	<b>03 MDL 1570 (GBD) (FM)</b>
	<b>:</b>	
	<b>:</b>	
<i>This document applies to</i>	<b>:</b>	
<i>Hoglan, et al. v. The Islamic Republic</i>	<b>:</b>	
<i>of Iran, et al.</i>	<b>:</b>	
<i>1:11-cv-07550-GBD</i>	<b>:</b>	

---

**DECLARATION OF ESTATE OF LENORE JACKSON, PREPARED BY JUDITH  
REISS, PRESONAL REPRESENTATIVE**

1. Joshua had an amazing Grandmother. Maybe I should say I had an amazing Mother. What women in her late 50's through her 70's would my four boys and later my daughter as well, for 4-6 weeks every summer? My Mama did not have baby sitters, maids or much other additional help than my Dad, but she took 4 rambunctious boys and their ability to get dirty for 4-6 weeks every summer.

2. My parents were at the hospital when Josh was born. They had come up a week earlier to be sure to be there with his big brother (all of 18 months) when I delivered 40 minutes away in Philadelphia. Josh had a few issues when he was born and my Mother called every doctor in our family to be sure he was getting the right care. Obviously, he did.

3. Josh's first real time with his Grandmother was when he was about a year. As Josh did not sleep or nap more than 20 minutes at one stretch, my husband needed a break and sent me and the two toddlers to Florida where my parents were spending the winter. My Mother put Josh into their bedroom as well as Adam as I looked like I was about to "fall over" as she described it.

4. On night one, Josh raised his head in the crib and started his normal scream. Without missing a beat, she looked up from her book and said, "Joshua, put your head down now. I read in bed and watch Johnny Carson and you will need to go to sleep!" She told me that he looked at her and must have figured that he was dealing with an established source and put his head down. He kept looking at her until he fell asleep.

5. Josh began going to "Camp Nanny and Poppy" as he named it when he was still in nighttime diapers. Remember, he insisted on sleeping in a bed and he came home not needing those nighttime extras. Josh truly adored his time every summer. He spent all winter planning his activities.

6. Josh loved the Florida State University Flying Circus that performed at Callaway Gardens. My Mom took him and the boys during the days and evenings. The Gardens were close to their home and she packed dry clothes, towels, and snacks so the boys could ride the train, see the circus, and visit the gardens and swim in the lake. Of course she made breakfast, lunch and dinner most days. Pine Mountain, GA, is a very small town with one small grocery store and one Hardee's!

7. Being a small town, their grandparents brought the boys bikes, roller blades and other necessary equipment down with them. Josh with Adam and Jordan rode their bikes to the Post Office to pick up mail.

8. Josh also had his day alone with his Nanny. They would drive into the big city of LaGrange and do grocery shopping, they would have lunch together. He usually got to find an activity that they could do together. She taught him how to feed the puppies born one summer. He took one home that year and it was his responsibility from age 5 on. He really did remember to feed Digger and take him out every day.

9. My Mother was the one who took those boys alone on planes to and from Florida. She checked homework assignments and made sure spelling and grammar were correct. So many nights when she was visiting and “threw” my husband and me out for a date night, she helped with homework. She listened to book reports, poems and drove my kids to Hebrew School, soccer, baseball, dancing and parties. She knew all of Joshua’s friends.

10. Josh often passed on his theories on life to his Grandmother. “A day without peanut putter isn’t worth living” was announced one evening in Florida when he and his Nanny had grilled burgers for lunch and he was to eat chicken for dinner. He also learned that “Women (It rhymed with swimmin’ at age 8) could be what they wanted to be” from his Nanny.

11. Joshua’s Nanny never missed any performances at school . On one occasion, she convinced a Delta reservations supervisor to switch her flight at no charge because, after all, what grandmother could miss her grandson as the alligator in Peter Pan? When My Mother came to Yardley, she brought her famous brisket. Not one, but several to be frozen. Although I make it exactly the same, Josh always knew mine for hers. He actually wrote down directions so she could program her TV recording device. She had the same written directions when she passed in 2009.

12. In later years, Josh’s Grandmother came to hold down the fort when I was able to join my husband on business trips. Josh being Josh figured he could sneak in skipping school one day. He forgot the school would call the house and ask if he was ill. At first my Mother was worried, but after about 30 minutes and no police call, she knew exactly what he was up to. When he came home on time, she sweetly asked him if he had a good day. Being a teenager and very loquacious, he embroidered a good story. She told him that she was glad he did well in school because the school nurse had called to see if he was ill. After a minutes silence, she told him that

she covered for him and read him the riot act. After another stunt and be exactly where he was supposed to be, and she would not tell his Mother. I never knew about this until after Josh's death. From what I learned they had several secrets.

13. Josh called his Nanny every day. My Mama had been a very successful business owner, and Josh knew that his Poppy never made any business decision without her input. Josh relied on her for advice and counsel.

14. Joshua was special to his grandparents. He was fortunate to have grandparents who were not only loving but teachers for him. He and his brothers knew that none of their friends had the same relationship has he did with their grandparents although some lived only a block or two away. He friends knew his grandparents and often wished that they had the same relationship with their own. I am aware that many cannot fathom or understand this type of relationship, but my parents patterned my grandparents. I often complained as a child that everyone needed one mother and father but who needed two? My kids had two sets of parents and I think they benefited as I did.

I declare under penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct to the best of my knowledge, information and belief.

EXECUTED this the 5 day of May, 2017.



Declarant